

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 03283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT
SYSTEM OF THE COMMONWEALTH OF
PUERTO RICO (“ERS”),

Debtor.

PROMESA
Title III

No. 17 BK 03566-LTS

**INFORMATIVE MOTION REGARDING THE STIPULATION AND ORDER FOR THE
PRODUCTION AND EXCHANGE OF INFORMATION**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-05523 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as bankruptcy case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

On January 10, 2020, the Court entered the *Stipulation and Order for the Production and Exchange of Confidential Information* (Dkt. No. 9797, the "Stipulation").

Paragraph 27 of the Stipulation provides that "[a]ny party that has filed a notice of participation pursuant to the Initial Objection Procedures adopted by the Court (Dkt. 8818-2) . . . may become a Party to this Stipulation and be bound by its terms by executing and filing with the Court its agreement to comply with the terms and conditions of this Stipulation[.]" Stipulation at ¶ 27.

The undersigned are counsel to UBS Financial Services Inc. of Puerto Rico and UBS Trust Company of Puerto Rico (collectively, the "UBS Parties"). The UBS Parties filed notices of participation pursuant to the Initial Objection Procedures adopted by the Court at Dkt. 8818-2. Previously, attorney Paul J. Lockwood executed the document required by Paragraph 27 of the Stipulation joining the UBS Parties to the Stipulation [Dkt. 9839]. Out of an abundance of caution, attached as Exhibit 1 is the executed document required by Paragraph 27 of the Stipulation that joins to the Stipulation additional attorneys for the UBS Parties.

Respectfully Submitted:

In San Juan, Puerto Rico, this 12th day of May, 2020.

OF COUNSEL:

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

Paul J. Lockwood (*admitted pro hac vice*)

One Rodney Square

P.O. Box 636

Wilmington, Delaware 19899

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McCONNELL VALDÉS LLC

270 Muñoz Rivera Ave.

Hato Rey, Puerto Rico 00918

Tel.: (787) 250-2631

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By: /s/ Roberto C. Quiñones-Rivera

Roberto C. Quiñones-Rivera, Esq.

USDC-PR Bar No. 211512

rcq@mcvpr.com

*Counsel for UBS Financial Services
Incorporated of Puerto Rico and UBS Trust
Company of Puerto Rico*

EXHIBIT 1

UBS Parties Joinder to the Stipulation

AGREEMENT TO RESPECT CONFIDENTIAL MATERIAL

I, Nicole A. DiSalvo, state that:

1. My address is One Rodney Square, PO Box 636, Wilmington, DE 19899.
2. I am an associate in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP.
3. My present job description is counsel to UBS Financial Services Inc. of Puerto Rico and UBS Trust Company of Puerto Rico in the above-captioned cases.
4. I have received a copy of the Stipulation and Order for the Production and Exchange of Confidential Information (the "Stipulation") entered in the above-entitled actions on January 10, 2020.
5. I have carefully read and understand the provisions of the Stipulation.
6. I will comply with all of the provisions of the Stipulation.
7. I will hold in confidence, will not disclose to anyone not qualified under the Stipulation, and will use only for purposes of these actions, any Confidential Information that is disclosed to me.
8. I will return all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained, or to counsel from whom I received the Confidential Information.
9. I hereby submit to the jurisdiction of this court for the purpose of enforcement of the Stipulation in this action.

Dated: 5/12/2020

/s/ Nicole A. DiSalvo
Nicole A. DiSalvo

AGREEMENT TO RESPECT CONFIDENTIAL MATERIAL

I, Elisa M.C. Klein, state that:

1. My address is One Rodney Square, PO Box 636, Wilmington, DE 19899.
2. I am an associate in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP.
3. My present job description is counsel to UBS Financial Services Inc. of Puerto Rico and UBS Trust Company of Puerto Rico in the above-captioned cases.
4. I have received a copy of the Stipulation and Order for the Production and Exchange of Confidential Information (the "Stipulation") entered in the above-entitled actions on January 10, 2020.
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6. I will comply with all of the provisions of the Stipulation.
7. I will hold in confidence, will not disclose to anyone not qualified under the Stipulation, and will use only for purposes of these actions, any Confidential Information that is disclosed to me.
8. I will return all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained, or to counsel from whom I received the Confidential Information.
9. I hereby submit to the jurisdiction of this court for the purpose of enforcement of the Stipulation in this action.

Dated: 5/12/2020

/s/ Elisa M.C. Klein
Elisa M.C. Klein

AGREEMENT TO RESPECT CONFIDENTIAL MATERIAL

I, Stephen J. Della Penna, state that:

1. My address is One Rodney Square, PO Box 636, Wilmington, DE 19899.
2. I am an associate in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP.
3. My present job description is counsel to UBS Financial Services Inc. of Puerto Rico and UBS Trust Company of Puerto Rico in the above-captioned cases.
4. I have received a copy of the Stipulation and Order for the Production and Exchange of Confidential Information (the "Stipulation") entered in the above-entitled actions on January 10, 2020.
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8. I will return all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained, or to counsel from whom I received the Confidential Information.
9. I hereby submit to the jurisdiction of this court for the purpose of enforcement of the Stipulation in this action.

Dated: 5/12/2020

/s/ Stephen J. Della Penna
Stephen J. Della Penna

AGREEMENT TO RESPECT CONFIDENTIAL MATERIAL

I, Roberto C. Quiñones-Rivera, state that:

1. My address is 270 Muñoz Rivera Avenue, Hato Rey, Puerto Rico 00918.
2. I am a partner in the law firm of McConnell Valdés LLC.
3. My present job description is counsel to UBS Financial Services Inc. of Puerto Rico and UBS Trust Company of Puerto Rico in the above-captioned cases.
4. I have received a copy of the Stipulation and Order for the Production and Exchange of Confidential Information (the "Stipulation") entered in the above-entitled actions on January 10, 2020.
5. I have carefully read and understand the provisions of the Stipulation.
6. I will comply with all of the provisions of the Stipulation.
7. I will hold in confidence, will not disclose to anyone not qualified under the Stipulation, and will use only for purposes of these actions, any Confidential Information that is disclosed to me.
8. I will return all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained, or to counsel from whom I received the Confidential Information.
9. I hereby submit to the jurisdiction of this court for the purpose of enforcement of the Stipulation in this action.

Dated: 5/12/2020

/s/ Roberto C. Quiñones-Rivera
Roberto C. Quiñones-Rivera

AGREEMENT TO RESPECT CONFIDENTIAL MATERIAL

I, Myrgia M. Palacios-Cabrera, state that:

1. My address is 270 Muñoz Rivera Avenue, Hato Rey, Puerto Rico 00918.
2. I am an income partner in the law firm of McConnell Valdés LLC.
3. My present job description is counsel to UBS Financial Services Inc. of Puerto Rico and UBS Trust Company of Puerto Rico in the above-captioned cases.
4. I have received a copy of the Stipulation and Order for the Production and Exchange of Confidential Information (the "Stipulation") entered in the above-entitled actions on January 10, 2020.
5. I have carefully read and understand the provisions of the Stipulation.
6. I will comply with all of the provisions of the Stipulation.
7. I will hold in confidence, will not disclose to anyone not qualified under the Stipulation, and will use only for purposes of these actions, any Confidential Information that is disclosed to me.
8. I will return all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained, or to counsel from whom I received the Confidential Information.
9. I hereby submit to the jurisdiction of this court for the purpose of enforcement of the Stipulation in this action.

Dated: 5/12/2020

/s/ Myrgia M. Palacios-Cabrera
Myrgia M. Palacios-Cabrera